

Noah Kane, Esq.
Consumer Attorneys PLLC
68-29 Main Street
Flushing, NY 11367
518-375-3963
Fax: 718-715-1750
Email: e-service@consumerattorneys.com

Attorneys for Plaintiff Valerie Piskorowski

James J. Lee, Esq.
Nevada Bar No. 001909
Legal Offices of James J. Lee
2620 Regatta Dr. #102
Las Vegas, NV 89102
702-664-6545
Fax: 702-946-1115
Email: james@leelitigate.com

*Attorneys for Defendant The Bank of
Missouri*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

VALERIE PISKOROWSKI,

Plaintiff,

v.

EXPERIAN INFORMATION
SOLUTIONS, INC., EQUIFAX
INFORMATION SERVICES, LLC,
TRANS UNION LLC, AND THE
BANK OF MISSOURI,

Defendants.

Case No.: 2:25-cv-00122-JCM-DJA

**JOINT MOTION FOR EXTENSION OF
TIME FOR DEFENDANT THE BANK OF
MISSOURI TO RESPOND TO
COMPLAINT**

FIRST REQUEST

Defendant The Bank of Missouri has requested an extension of time to answer,
move or otherwise respond to the Complaint of Plaintiff Valerie Piskorowski ("Plaintiff")

1 and together with TBOM, the “Parties”), to which Plaintiff has no opposition.
2 Accordingly, by this joint motion, IT IS HEREBY STIPULATED AND AGREED to by
3 and among counsel, that Defendant The Bank of Missouri’s time to answer, move or
4 otherwise respond to the Complaint in this action is extended from February 19, 2025
5 through and including **March 5, 2025**.

6 TBOM has requested the extension so that it has a sufficient opportunity to
7 compile, review, and evaluate its business records and other files related to the
8 allegations and claims in the Complaint, and Plaintiff approves. The extension will also
9 provide the Parties with additional time to continue their discussions regarding the matter
10 and the potential for a resolution of the claims at an early stage of the case.

11 As the Court is aware, this request to extend TBOM’s deadline to answer, move or
12 otherwise respond to the Complaint was initially made on February 19, 2025, prior to
13 expiration of any applicable deadlines, but was inadvertently filed as a stipulation as
14 opposed to a joint motion. By Minute Order dated February 20, 2025, the Court denied
15 the previously filed request without prejudice. The Court advised that any future motion
16 be filed in compliance with the applicable Federal and Local Rules. Accordingly, by this
17 joint motion, the Parties are simply refiling their prior request made on February 19,
18 2025, this time in the proper form as a joint motion, as directed by the Court’s Minute
19 Order and in compliance with the applicable rules.

20 This joint motion is filed in good faith and not for the purposes of delay. This is
21 the first request for an extension of this deadline.

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1 TBOM has not waived any objection to the venue or jurisdiction of the Court over
2 the person of TBOM, or any other challenge to Plaintiff's complaint or other pleadings
3 filed in this case.

4 Respectfully submitted, this 21st day of February, 2025.

5
6 **Consumer Attorneys PLLC**

7
8 /s/ Noah Kane
9 Noah Kane, Esq.
68-29 Main Street
10 Flushing, NY 11367
Attorneys for Plaintiff Valerie Piskorowski

11
12 **Legal Offices of James J. Lee**

13
14 /s/ James J. Lee
15 James J. Lee, Esq.
2620 Regatta Dr. #102
16 Las Vegas, NV 89102
Attorneys for Defendant The Bank of Missouri

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18 **ORDER**

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20 IT IS SO ORDERED:

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23 DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

24 DATED: 2/25/2025
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